



PACIFIC FOREST TRUST

Board of Forestry and Fire Protection
ATTN: Edith Hannigan, Board Analyst
VTP Draft PEIR Comments
PO Box 944246
Sacramento, CA 94244-2460

By electronic submission to VegetationTreatment@bof.ca.gov

Re: Vegetation Treatment Program Programmatic Environmental Impact Report

January 12, 2018

Dear Ms. Edith Hannigan,

Pacific Forest Trust is supportive of completion of the VTPEIR to facilitate increased forest restoration in California, particularly streamlining and accelerating the use of prescribed fire. The careful use of fire to proactively reduce fuel loads is an essential tool in reducing the risk of more intense and damaging fires, restoring ecological function, and creating more resilient forest conditions.

California is predominantly a fire-adapted ecosystem where decades of aggressive fire suppression have led to unnaturally high fuel loads in our forests and other wildland areas, including the wildland urban interface. Today's fire suppression techniques are at least 97% effective at suppressing fires with an aggressive initial attack,ⁱ which typically results in only the strongest and most severe fires escaping to impact the larger landscapeⁱⁱ and has helped create a "fire deficit" in the state.ⁱⁱⁱ Historically, over four million acres burned in California each year, which is more than 10 times today's average.^{iv} The Forest Service has already pledged to increase their thinning and prescribed burns activities to 500,000 acres per year of by 2020.^v

The state has made some progress in recent years to increase prescribed fire in forests under the leadership of Director Pimlott. This VTPEIR represents an important step in supporting the department's goals to increase prescribed fire by creating a programmatic document which will provide a context for landscape-scale reduction of fuels and restoration of fire. The goal of 60,000 acres/ year of treatment (including an estimated 30,000 acres of prescribed fire) set forth in the VTP PEIR is a good start, though ultimately the state will need to do much more to restore fire to our forests.

This VTP PEIR will help restore fire to the landscape, but it should be thought of as just one piece in the state's larger strategy to increase fire at a landscape scale. We look forward to working with you on this and other aspects of fire policy. Please don't hesitate to contact me at pmason@pacificforest.org or (916)214-1382 if you have any questions about these comments.

Sincerely,



Paul Mason
V.P. Policy

ⁱ Calkin, D.E., Gebert, K.M., Jones, J.G., Neilson, R.P., 2005. Forest Service large fire area burned and suppression expenditure trends, 1970–2002. *Journal of Forestry* 103, 179–183.

ⁱⁱ Calkin, D.E., Thompson, M.P., Finney, M.A., 2015. Negative consequences of positive feedbacks in US wildfire management. *Forest Ecosystems* 2, 9. doi:10.1186/s40663-015-0033-8

ⁱⁱⁱ Marlon, J.R., Bartlein, P.J., Gavin, D.G., Long, C.J., Anderson, R.S., Briles, C.E., Brown, K.J., Colombaroli, D., Hallett, D.J., Power, M.J., Scharf, E.A., Walsh, M.K., 2012. Long-term perspective on wildfires in the western USA. *PNAS* 109, E535–E543. doi:10.1073/pnas.1112839109

^{iv} Stephens, S.L., Martin, R.E., Clinton, N.E., 2007. Prehistoric fire area and emissions from California's forests, woodlands, shrublands, and grasslands. *Forest Ecology and Management* 251, 205–216. doi:10.1016/j.foreco.2007.06.005

^v <https://www.fs.usda.gov/detail/r5/landmanagement/?cid=stelprdb5412095>